

Carsten, Douglas

From: Carsten, Douglas
Sent: Tuesday, April 01, 2008 7:04 AM
To: 'mak@kramerlawip.com'
Cc: 'michael@kalerlaw.com'; Nye, Debra
Subject: Re: Sorensen v Sanyo

Hello Ms. Kramer,

Please let me know when you expect to be in a position to share Sorensen's stay proposal. Thanks very much in advance.

Doug Carsten
Sent from my Blackberry wireless handheld.

----- Original Message -----

From: mak@kramerlawip.com <mak@kramerlawip.com>
To: Carsten, Douglas
Cc: michael@kalerlaw.com <michael@kalerlaw.com>; esbjork@gmail.com <esbjork@gmail.com>
Sent: Wed Mar 05 08:28:11 2008
Subject: RE: Sorensen v Sanyo

Dear Mr. Carsten,

I will prepare a stipulation and forward it to you promptly. I am out of town today, but should have it ready for you tomorrow. Also, we will endeavor to have a proposal regarding discovery to you by March 31st.

Sincerely,

Melody A. Kramer

> ----- Original Message -----

> From: "Carsten, Douglas" <DCarsten@foley.com>
> To: mak@kramerlawip.com
> Subject: RE: Sorensen v Sanyo
> Date: Tue, 4 Mar 2008 13:51:00 -0800

>
>
> Hello Ms. Kramer,
>
> Thank you for your email. Sanyo accepts your offer of an additional
> thirty days in which to respond to the complaint. By my calculation,
> that would place Sanyo's response date up to and including April 9,
> 2008. If my calculation is incorrect, please do not hesitate to let
> me know. In addition, please let me know if you would be so kind as
> to prepare a suitable stipulation acceptable to Sorensen for my review.

>
> I presume from your email that this extension will serve to allow you
> to further determine the terms Sorensen would request in connection
> with a proposed partial stay. I would appreciate your providing to me
> whatever proposal Sorensen has in mind for such a partial stay on or
> before March 31, 2008 so that Sanyo has appropriate time to digest
> your proposal in advance of the response date. I would also request
> that such a proposal specifically set forth what discovery (if any)
> Sorensen would request in connection with such a partial stay. Please
> let me know at your earliest convenience if you agree to providing
> that information in the stated timeframe.

>
> I look forward to hearing from you.

> Truly yours,

>
> Doug Carsten

>
> -----Original Message-----
> From: mak@kramerlawip.com [mailto:mak@kramerlawip.com]
> Sent: Tuesday, March 04, 2008 9:59 AM
> To: Carsten, Douglas
> Cc: michael@kaler.com
> Subject: Sorensen v Sanyo
>
> Dear Mr. Carsten:
>
> Thank you for your email of February 28th.
> Based on some recent developments, I will not be in a position to
> forward you a proposed stipulation for partial stay of this case yet.
> Comments by Judge Moskowitz in a related proceeding (transcript
> attached), as well as new information that we presented to the Court
> in opposition to another motion for stay (memorandum attached), place
> the entire landscape of the scope and duration of any stay that the
> Court may enter in substantial question.
>
> If Sanyo would like to have an additional 30 days before having to
> respond to the Complaint, we are amenable to such a stipulation.
>
> Melody A. Kramer
> Kramer Law Office, Inc.
> 9930 Mesa Rim Road, Suite 1600
> San Diego, CA 92121
> 858/362-3150 direct
> 858/824-9073 fax
>
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